

EXHIBIT 2-C

Homecomings Responses to Requests for Production of Documents

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	
	:	Case No. 12-12020 (MG)
RESIDENTIAL CAPITAL, LLC, et al.,	:	
	:	Chapter 11
	:	
Debtors.	:	Jointly Administered
	:	
	:	
	:	

**THE RESCAP BORROWER CLAIMS TRUST'S RESPONSES AND OBJECTIONS TO
CLAIMANT' FIRST REQUEST FOR PRODCUTION OF DOCUMENTS DIRECTED
AT HOMECOMINGS FINANCIAL, LLC**

Pursuant to Rules 7026 and 7034 of the Federal Rules of Bankruptcy Procedure, the ResCap Borrower Claims Trust (the "Borrower Trust"), by and through its undersigned counsel, hereby responds and objects to the Claimant's First Request for the Production of Documents (the "Requests"), dated November 20, 2015, on the grounds stated below.

General Objections

1. The Borrower Trust objects to the Requests to the extent that they seek to impose a burden or obligation beyond those required or permitted by the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, other applicable law, or any orders of the Court.

2. The Borrower Trust objects to the Requests to the extent that the information sought is unreasonably cumulative or duplicative or is obtainable from some other source that is more convenient, less burdensome or less expensive.

3. The Borrower Trust further objects to the Requests to the extent they seek information already available to the Claimant.

4. The Borrower Trust objects to the Requests to the extent they request the

production of electronically stored information that is not reasonably accessible because of *inter alia* undue burden or cost.

5. The Borrower Trust objects to the Requests to the extent they are overly broad, unduly burdensome or seek information that is not relevant to the outstanding disputed issue of fact defined by the Bankruptcy Court in this litigation, or are otherwise outside the scope of discovery permitted by the Federal Rules of Bankruptcy Procedure. The Borrower Trust also objects to the Requests to the extent they are vague and ambiguous, or fail to specify the documents sought with reasonable particularity.

6. The Borrower Trust objects to the Requests to the extent they purport to require the Borrower Trust to provide information outside its possession, custody or control.

7. The Borrower Trust objects to the Requests to the extent that they seek documents that are publicly available, have already been furnished to, or are otherwise in the possession, custody or control of the Claimant.

8. The Borrower Trust objects to the Requests to the extent they seek information or documents that are protected by the attorney-client privilege, that are protected by the work product doctrine, that were prepared in anticipation of litigation, that constitute or disclose the mental impressions, conclusions, opinions, or legal theories of any attorney or other representative of the Borrower Trust concerning this or any other litigation, or that are protected by any other privilege or doctrine. To the extent that the Requests call for documents protected by the attorney-client privilege, attorney work product immunity, or other privileges or immunities, such documents will not be produced.

9. The Borrower Trust objects to Instruction "Objection to Production" to the extent it requires a response greater than what is required under Federal Rule of Bankruptcy Procedure

7034, which only requires that a response state the objection to the request, including the reasons.

10. The Borrower Trust objects to the instruction “Applicable Time Period” as it exceeds the period relevant to this litigation. The Borrower Trust will produce documents related to the period that the Mortgage Loan was serviced by the Debtors: November 2006 to April 2008.

11. The Borrower Trust objects to the Instructions for the Document Requests to the extent they impose undue burden or expense on the Borrower Trust, seek information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, seek information or metadata that does not exist or is not kept in the ordinary course of business, and/or seek information that is protected by applicable doctrines of confidentiality or privilege.

Specific Objections to Document Requests

Document Request No. 1

All documents which mention, discuss, describe, relate to, refer to or embody any communications between YOU and Aurora concerning the transfer of servicing subject to the Property to Aurora.

Response to Document Request No. 1

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Additionally, there were no communications between Homecomings and Aurora concerning the transfer of servicing of the Mortgage Loan.

Document Request No. 2

All documents evidencing a sale, transfer or assignment of the servicing rights of the Mortgage Loan from YOU to Aurora.

Response to Document Request No. 2

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Subject to the General and specific Objections, the Borrower Trust will produce copies of all documents evidencing a sale, transfer or assignment of the servicing rights of the Mortgage Loan from YOU to Aurora. Such documents are located at BT000684 through BT000699 and BT000011 through BT000014.

Document Request No. 3

All documents which mention, discuss, describe, relate to, refer to or embody any communications between YOU and the DBTCA concerning the transfer of servicing subject to the Property to Aurora.

Response to Document Request No. 3

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Additionally, the

Debtors' books and records do not show that there were any communications between Homecomings and DBCTA concerning the transfer of servicing of the Mortgage Loan.

Document Request No. 4

All documents which mention, discuss, describe, relate to, refer to or embody any communications between YOU and all rating agencies concerning the transfer of servicing to Aurora.

Response to Document Request No. 4

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Additionally, the Debtors' books and records do not show that there were any communications between Homecomings and any rating agency concerning the transfer of servicing of the Mortgage Loan.

Document Request No. 5

All documents which mention, discuss, describe, relate to, refer to or embody any communications between YOU and the Securities and Exchange Commission concerning the transfer of servicing to Aurora.

Response to Document Request No. 5

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the

discovery of admissible evidence and thus are outside the scope of discovery. Additionally, the Debtors' books and records do not show that there were any communications between Homecomings and Securities and Exchange Commission concerning the transfer of servicing of the Mortgage Loan.

Document Request No. 6

All monthly distribution statements to the RALI Trust's Certificate-Holders from YOU.

Response to Document Request No. 6

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 7

All monthly distribution statements to the RALI Trust's Certificate-Holders from Homecomings, GMC RFC, Nationstar and Ocwen between December 2007 and April 2014.

Response to Document Request No. 7

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Additionally, the Borrower Trust objects to the Request to the extent it seeks documents that relate to the period after servicing of the Loan was transferred to Aurora in April 2008. The Borrower Trust also

objects to the Request to the extent it seeks documents not in the possession or control of the Borrower Trust.

Document Request No. 8

All Form "FR 2046" Balance sheet with the OMB Number 7100-0289, subject to disclosure.

Response to Document Request No. 8

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 9

All documents which mention, discuss, describe, relate to, refer to or embody any communications between YOU and the Claimant concerning the Mortgage Loan.

Response to Document Request No. 9

Subject to the General Objections, the Borrower Trust will produce copies of all documents reflecting any communications between Homecomings and the Claimant concerning the Mortgage Loan. Such documents are located at BT000001 through BT 000308 and BT000684 through BT000699.

Document Request No. 10

All documents establishing that the Mortgage Loan was deposited into the RALI Trust.

Response to Document Request No. 10

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 11

All documents which mention, discuss, describe, relate to, or refer to the RALI Trust owning or holding the Mortgage Loan.

Response to Document Request No. 11

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 12

All documents which mention, discuss, describe, relate to, or refer to the RALI Trust selling, assigning or transferring the Mortgage Loan.

Response to Document Request No. 12

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 13

Curriculum vitae for any experts you intend to call at trial for this Contested Matter.

Response to Document Request No. 13

The Borrower Trust does not anticipate relying on expert testimony.

Document Request No. 14

All documents YOU received from Claimant.

Response to Document Request No. 14

The Debtors' books and records do not reflect any documents received by Homecomings from the Claimant during the period Homecomings serviced the Mortgage Loan.

Document Request No. 15

All documents which mention, discuss, describe, relate to, refer to or embody all statements, oral or written, from any person involved with, or knowledgeable of, the facts about the circumstances on which this Contested Matter is based.

Response to Document Request No. 15

Subject to the General Objections, the Borrower Trust will produce copies of all documents which mention, discuss, describe, relate to, refer to or embody all statements, oral or written, from any person involved with, or knowledgeable of, the facts about the circumstances on which this Contested Matter is based that are not subject to attorney client privilege. Such documents are located at BT000684 through BT000864.

Document Request No. 16

Any and all documents, correspondence, reports and/or memoranda which support
YOUR Answer to Interrogatory No. 7.

Response to Document Request No. 16

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 17

Any and all documents, correspondence, reports and/or memoranda which support
YOUR Answer to Interrogatory No. 8.

Response to Document Request No. 17

Subject to the General Objections, the Borrower Trust will produce or make available for inspection all documents which support Homecomings answer to Interrogatory No. 8. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 8.

Document Request No. 18

Any and all documents, correspondence, reports and/or memoranda which support
YOUR Answer to Interrogatory No. 9.

Response to Document Request No. 18

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 9.

Document Request No. 19

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 10.

Response to Document Request No. 19

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 10.

Document Request No. 20

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 11.

Response to Document Request No. 20

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 11.

Document Request No. 21

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 12.

Response to Document Request No. 21

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 12.

Document Request No. 22

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 13.

Response to Document Request No. 22

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 13.

Document Request No. 23

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 14.

Response to Document Request No. 23

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 14.

Document Request No. 24

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 15.

Response to Document Request No. 24

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: the Borrower Trust will produce copies of all documents which support Homecomings answer to Interrogatory No. 16. Such document is located at BT000902.

Document Request No. 25

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 16.

Response to Document Request No. 25

Subject to the General Objections, the Borrower Trust will produce copies of all documents which support Homecomings answer to Interrogatory No. 16. Such document is located at BT000684 through BT000699 and BT000011 through BT000014..

Document Request No. 26

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 17.

Response to Document Request No. 26

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information

neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 17.

Document Request No. 27

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 18.

Response to Document Request No. 27

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust will produce copies of documents evidencing Judy Faber's employment history with the Debtors. Such document is located at BT000865.

Document Request No. 28

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 19.

Response to Document Request No. 28

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information

neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 19.

Document Request No. 29

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 20.

Response to Document Request No. 29

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 20.

Document Request No. 30

Any and all documents, correspondence, reports and/or memoranda which support YOUR Answer to Interrogatory No. 21.

Response to Document Request No. 30

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information

neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 31

Any and all documents, correspondence, reports and/or memoranda which support
YOUR Answer to Interrogatory No. 22.

Response to Document Request No. 31

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 22.

Document Request No. 32

Any and all documents, correspondence, reports and/or memoranda which support
YOUR Answer to Interrogatory No. 23.

Response to Document Request No. 32

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as

follows: There are no documents which support the answer to Interrogatory No. 23.

Document Request No. 33

Any and all documents, correspondence, reports and/or memoranda which support
YOUR Answer to Interrogatory No. 24.

Response to Document Request No. 33

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: There are no documents which support the answer to Interrogatory No. 24.

Document Request No. 34

Any and all documents, correspondence, reports and/or memoranda which support
YOUR Answer to Interrogatory No. 25.

Response to Document Request No. 34

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Response to Document Request Nos. 35 through 92

In addition to their General Objections, the Borrower Trust objects to these Document Requests because they seek answers to Interrogatories that exceed the number permitted under Federal Rule of Civil Procedure 33(a)(1), which is incorporated by Federal Rule of Bankruptcy Procedure 7033. The Borrower Trust further objects to these Requests on the ground that they seek information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 93

All Reports on Assessment and the related Attestation Reports prepared by YOU and filed with the Securities and Exchange Commission in relation to the RALI Trust.

Response to Document Request No. 93

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. The Borrower Trust also objects to this Request to the extent such information is publicly available at: <http://www.sec.gov/cgi-bin/browse-edgar?CIK=0001384915&Find=Search&owner=exclude&action=getcompany>.

Document Request No. 94

All documents which mention, discuss, describe, relate to, or refer to YOUR servicing platform in relation to the RALI Trust.

Response to Document Request No. 94

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 95

All Platform Level Reports that directly or indirectly included the Mortgage Loan transaction and that were registered with the SEC pursuant to the Securities Act of 1933.

Response to Document Request No. 95

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. The Borrower Trust also objects to this Request to the extent such information is publicly available at: <http://www.sec.gov/cgi-bin/browse-edgar?CIK=0001384915&Find=Search&owner=exclude&action=getcompany>.

Document Request No. 96

All servicing agreements between YOU and the RALI Trust.

Response to Document Request No. 96

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information

neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. The Borrower Trust also objects to this Request to the extent such information is publicly available at: <http://www.sec.gov/cgi-bin/browse-edgar?CIK=0001384915&Find=Search&owner=exclude&action=getcompany>.

Document Request No. 97

All servicing agreements in relation to the Mortgage Loan between YOU and RFC.

Response to Document Request No. 97

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request to the extent manuals after the year 2007 are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to the General Objections, the Borrower Trust will produce a copy of the servicing agreement that was in place between Homecomings and RFC in November 2007. Such documents are located at BT000309 through BT000683.

Document Request No. 98

All servicing agreements in relation to the Mortgage Loan between YOU and GMACM.

Response to Document Request No. 98

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving

the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: there are no servicing agreements in relation to the Mortgage Loan between Homecomings and GMACM.

Document Request No. 99

All servicing agreements in relation to the Mortgage Loan between YOU and ResCap.

Response to Document Request No. 99

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: there are no servicing agreements in relation to the Mortgage Loan between Homecomings and ResCap.

Document Request No. 100

All Servicer Compliance Statements made by YOU with respect to the pool of assets claimed to have been transferred to RALI Trust.

Response to Document Request No. 100

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving

the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: there are no Servicer Compliance Statements made by Homecomings with respect to the pool of assets claimed to have been transferred to RALI Trust.

Document Request No. 101

Assignment and Assumption Agreement, dated as of January 30, 2007, between YOU and RALI.

Response to Document Request No. 101

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. The Borrower Trust also objects to this Request to the extent such information is publicly available at: <http://www.sec.gov/cgi-bin/browse-edgar?CIK=0001384915&Find=Search&owner=exclude&action=getcompany>.

Document Request No. 102

All YOUR Certifications pursuant to Rule 13a-14(d)/15d-14(d) under the Securities Exchange Act of 1934.

Response to Document Request No. 102

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the

discovery of admissible evidence and thus are outside the scope of discovery. The Borrower Trust also objects to this Request to the extent such information is publicly available at: <http://www.sec.gov/cgi-bin/browse-edgar?CIK=0001384915&Find=Search&owner=exclude&action=getcompany>.

Document Request No. 103

All Reports on Assessment of Compliance with Servicing Criteria of RFC as of and for the period ended December 31, 2007.

Response to Document Request No. 103

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: The Borrower Trust reviewed all of the documents contained in the Debtors' books and records that are accessible to the Borrower Trust and was unable to locate any Reports on Assessment of Compliance with Servicing Criteria of RFC as of and for the period ended December 31, 2007.

Document Request No. 104

All Reports on Assessment of Compliance with Servicing Criteria of GMACM for the pre-platform integration period from January 1, 2007 through April 30, 2007, in relation to the RALI Trust.

Response to Document Request No. 104

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 105

All Reports on Assessment of Compliance with Servicing Criteria of GMACM for the post-platform integration period from May 1, 2007 through December 31, 2007, in relation to the RALI Trust.

Response to Document Request No. 105

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 106

All Reports on Assessment of Compliance with Servicing Criteria of Homecomings Financial, LLC for the post-platform integration period from May 1, 2007 through December 31, 2007, in relation to the RALI Trust.

Response to Document Request No. 106

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information

neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: The Borrower Trust reviewed all of the documents contained in the Debtors' books and records that are accessible to the Borrower Trust and was unable to locate any Reports on Assessment of Compliance with Servicing Criteria of Homecomings Financial, LLC for the post-platform integration period from May 1, 2007 through December 31, 2007, in relation to the RALI Trust.

Document Request No. 107

All Reports on Assessment of Compliance with Servicing Criteria of Homecomings Financial, LLC for the pre-platform integration period from January 1, 2007 through April 30, 2007, in relation to the RALI Trust.

Response to Document Request No. 107

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: The Borrower Trust reviewed all of the documents contained in the Debtors' books and records that are accessible to the Borrower Trust and was unable to locate any Reports on Assessment of Compliance with Servicing Criteria of Homecomings Financial, LLC for the pre-

platform integration period from January 1, 2007 through April 30, 2007, in relation to the RALI Trust.

Document Request No. 108

All Attestation Reports of PricewaterhouseCoopers LLP on Assessment of Compliance with Servicing Criteria relating to GMACM and Homecomings.

Response to Document Request No. 108

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. The Borrower Trust further objects to the Request to the extent it is overly broad, vague, and burdensome and is not proportional to the needs of the case, on the ground that it does not define which reports are being requested, to whom the reports were produced, and does not limit the reports to those relevant to the Mortgage Loan. To the extent this Request seeks documents related to the independent foreclosure review conducted by PricewaterhouseCoopers, the Mortgage Loan was not a part of such review because no Debtor entity referred the Mortgage Loan to foreclosure.

Document Request No. 109

All pool performance calculations on behalf of the RALI Trust from November 1, 2006 through the present.

Response to Document Request No. 109

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Additionally, the Borrower Trust objects to the Request to the extent it seeks documents that relate to the period after servicing of the Loan was transferred to Aurora in April 2008.

Document Request No. 110

All distribution calculations on behalf of the RALI Trust from November 1, 2006 through the present.

Response to Document Request No. 110

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Additionally, the Borrower Trust objects to the Request to the extent it seeks documents that relate to the period after servicing of the Loan was transferred to Aurora in April 2008.

Document Request No. 111

All REMIC tax returns on behalf of the RALI Trust from November 1, 2006 through the present.

Response to Document Request No. 111

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 112

Provide the Certificate-Holders' notices of the occurrence of a default under the RALI Trust's Pooling and Servicing Agreement.

Response to Document Request No. 112

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 113

Provide the RALI Trust's Pooling and Servicing Agreement dated on or about December 1, 2006.

Response to Document Request No. 113

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. The Borrower

Trust also objects to this Request to the extent such information is publicly available at:

[http://www.sec.gov/cgi-bin/browse-edgar?CIK=0001384915&Find=Search&owner=exclude
&action=getcompany](http://www.sec.gov/cgi-bin/browse-edgar?CIK=0001384915&Find=Search&owner=exclude&action=getcompany).

Document Request No. 114

All Homecomings Servicer's Policy Manuals for the years 2006, 2007, 2008, and 2009.

Response to Document Request No. 114

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request to the extent manuals after the year 2007 are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to the General Objections, the Borrower Trust will produce a copy of the Homecomings servicer guide that was in place in November 2007. Such documents are located at BT000309 through BT000683.

Document Request No. 115

All documents which mention, discuss, describe, relate to, refer to or embody any communications between you and the Claimant concerning Claimant's Mortgage Loan or the servicing of Claimant's Mortgage Loan.

Response to Document Request No. 115

Subject to the General Objections, the Borrower Trust will produce copies of all documents which mention, discuss, describe, relate to, refer to or embody any communications between you and the Claimant concerning Claimant's Mortgage Loan or the servicing of

Claimant's Mortgage Loan. Such documents are located at BT000684 through BT000699 and BT000001 through BT000308.

Document Request No. 116

All documents which mention, discuss, describe, relate to, or refer to the RALI Trust owning or holding the Mortgage Loan.

Response to Document Request No. 116

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 117

All documents which mention, discuss, describe, relate to, or refer to YOUR transfer of YOUR servicing rights related to the loans deposited into the RALI Trust.

Response to Document Request No. 117

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 118

All documents which establish that the Mortgage Loan was deposited into the RALI Trust.

Response to Document Request No. 118

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 119

All documents which mention, discuss, describe, relate to, or refer to the transfer of YOUR servicing rights related to the loans deposited to into the RALI Trust to GMACM in 2007.

Response to Document Request No. 119

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 120

All documents which mention, discuss, describe, relate to, or refer to the transfer of YOUR servicing rights related to the loans deposited to into the RALI Trust to Aurora in 2007.

Response to Document Request No. 120

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 121

All documents which mention, describe, relate to, or refer to the RALI Trust owning the Mortgage Loan.

Response to Document Request No. 121

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 122

All reports assessing compliance with the RALI Trust's servicing criteria applicable to YOU.

Response to Document Request No. 122

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery. Without waiving

the General Objections and any foregoing specific objections, the Borrower Trust responds as follows: The Borrower Trust reviewed all of the documents contained in the Debtors' books and records that are accessible to the Borrower Trust and was unable to locate any reports assessing compliance with the RALI Trust's servicing criteria applicable to Homecomings.

Document Request No. 123

All documents which mention, discuss, describe, relate to, or refer to the Homecomings' servicing platform in relation to the loans deposited into the RALI Trust.

Response to Document Request No. 123

In addition to the General Objections set forth above, which are incorporated by reference herein, the Borrower Trust further objects to this Request on the ground that it seeks information neither relevant to the issues that are in the case nor reasonably calculated to lead to the discovery of admissible evidence and thus are outside the scope of discovery.

Document Request No. 124

If YOU denied any Request to Admit, please identify the Request and provide all documents upon which you rely to deny the Request.

Response to Document Request No. 124

Subject to the General Objections, the Borrower Trust will produce copies of all documents which the Borrower Trust relied to deny any Request to Admit that was not objected to for being irrelevant to the issues that are in the case. The Borrower Trust also objects to this Request to the extent such information is publicly available at: <http://www.sec.gov/cgi-bin/browse-edgar?CIK=0001384915&Find=Search&owner=exclude &action=getcompany>.

Documents related to Requests for Admission number 19, which relate to the Pooling and Servicing Agreement, are objected to on the grounds that such information is publicly available. All other documents withheld that are responsive to this Request are being withheld because the Request for Admission to which they relate is objected to by the Borrower Trust for being irrelevant to the issues that are in this case. Such documents are located at BT000011 through BT000014 and BT000684 through BT000699.

* * *

The Borrower Trust reserves the right to amend or supplement these objections. The Borrower Trust reserves the right to recover costs associated with responding to the Document Request.

Dated: December 21, 2015
New York, New York



/s/
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